

DEC 13 2005

For The Northern Mariana Islands
By _____
(Deputy Clerk)

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Attorneys for Plaintiff Maria Hellena Jebehn

**IN THE UNITED STATES DISTRICT COURT
 FOR THE
 NORTHERN MARIANA ISLANDS**

MARIA HELLENA JEBEHN,)	CIVIL ACTION NO.03-0027
)	
Plaintiff,)	PLAINTIFF'S NOTICE OF
v.)	MOTION AND MOTION FOR
)	RECONSIDERATION OF
JOSEPH JOHN HERRERA;)	ORDER GRANTING
ALOHA COUNCIL BOY SCOUTS OF)	DANILO T. AGUILAR'S
AMERICA, INC.; and BOY SCOUTS)	MOTION TO WITHDRAW
OF AMERICA, INC.,)	AS ATTORNEY OF RECORD
)	
Defendants.)	Date: February 9, 2006
)	Time: 9:00 a.m.
)	Judge: Alex R. Munson

NOTICE OF MOTION

PLEASE TAKE NOTICE that on the 9th day of February, 2006, at the hour of 9:00 a.m., Plaintiff Maria Hellena Jebehn will move this Court for reconsideration of the Order Granting Danilo T. Aguilar's Motion to Withdraw as Attorney of Record dated December 1, 2005, or in the alternative, to set the motion for hearing.

MOTION

This Motion is made pursuant to Fed. R. Pro. 60(b)(6). The basis of this motion is that Plaintiff was entitled to be heard and have notice of counsel's motion to withdraw as counsel of

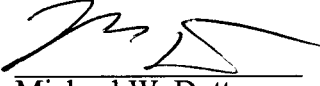
1 Defendant Herrera. Mr. Aguilar's notice of withdrawal was not set for hearing thereby depriving
2 Plaintiff of the opportunity to be heard.

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4 This motion is supported by the attached Memorandum, Declaration, Plaintiff's Motion
5 to Enforce Settlement Agreement or in the alternative, Motion for Order to Show Cause, and the
6 records and files in this case.

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9 Respectfully submitted this 12 day of December, 2005.

10 O'CONNOR BERMAN DOTTS & BANES
11 Attorneys for Plaintiff

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13 By:


14 Michael W. Dotts
15 (F0150)
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